

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

**HEALTH DIAGNOSTIC LABORATORY,
INC., et al.,**

Debtors.¹

Chapter 11

Case No.: 15-32919-KRH

Jointly Administered

NOTICE OF MOTION TO EXPEDITE AND NOTICE OF HEARING

PLEASE TAKE NOTICE that on December 8, 2017, Plaintiff, Richard Arrowsmith, in his capacity as Liquidating Trustee of the HDL Liquidated Trust (the “**Liquidating Trustee**”), appointed pursuant to the Debtors’ confirmed *Modified Second Amended Plan of Liquidation* (the “**Plan**”) in these jointly administered bankruptcy cases (the “**Chapter 11 Cases**” or the “**Cases**”), by his undersigned counsel, filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “**Court**”) a *Motion for an Order Expediting Consideration of, and Shortening the Notice Period Applicable to, Motion to Approve Settlement Agreement Between Richard Arrowsmith, Liquidating Trustee of the HDL Liquidating Trust, and G. Russell Warnick, and to Direct Payment of Proceeds of Certain Insurance Policies* (the “**Motion to Expedite**”) in the adversary proceeding number 17-03029.

In the Motion to Expedite, the Liquidating Trustee requests that this Court enter an order expediting consideration of, and shortening the notice period applicable to the *Motion to Approve Settlement Agreement Between Richard Arrowsmith, Liquidating Trustee of the HDL*

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Health Diagnostic Laboratory, Inc. (0119), Central Medical Laboratory, LLC (2728), and Integrated Health Leaders, LLC (2434).

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Liquidating Trustee of the HDL Liquidating Trust*

*Counsel to Plaintiff Richard Arrowsmith
Liquidating Trustee of the HDL Liquidating Trust*

Liquidating Trust, and G. Russell Warnick, and to Direct Payment of Proceeds of Certain Insurance Policies (the “**Settlement Motion**”)² such that the Motion may be heard before the Court on December 14, 2017 at 2:00 PM, and any responses to the relief requested shall be filed by 12:00 PM (EST) on December 13, 2017.

PLEASE TAKE FURTHER NOTICE that a copies of the Motion to Expedite and the Motion may be obtained at no charge at www.americanlegal.com/HDL or for a fee at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion to Expedite carefully and discuss it with your attorney, if you have one in the Chapter 11 cases. (If you do not have an attorney, you may wish to consult one.)

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the Motion to Expedite, or if you want the Court to consider your views on the Motion to Expedite, then, by December 13, 2017 at 12:00 noon (the “**Objection Deadline**”), you or your attorney must:

- ☒ File with the Court, either electronically or at the address shown below, a written response pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the applicable case management procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion to Expedite as conceded and enter an appropriate order granting the requested relief without further notice or hearing.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Suite 4000
Richmond, VA 23219

You must also serve a copy of your written Objection to the Liquidating Trustee and any affected parties so that the Objection is received on or before the Objection Deadline.

- ☒ Attend a hearing before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, at **2:00 PM (EST) on December 14, 2017**, at the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, Room 5000, Richmond, Virginia 23219.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Settlement Agreement.

Dated: December 8, 2017
Richmond, Virginia

Respectfully submitted,

/s/ Cullen D. Speckhart

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